# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

**C.H.** and **R.H.** o/b/o **P.H.**,

Case No. 1:25-cv-680

Plaintiffs/Appellants/Petitioners,

Hon. Hala Y. Jarbou

v.

EAST LANSING PUBLIC SCHOOLS and INGHAM INTERMEDIATE SCHOOL DISTRICT,

Defendants/Appellees/Respondents.

Elizabeth K. Abdnour (P78203)
Megan N. Mitchell (P87312)
Jacquelyn Kmetz (P83575)
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### PLAINTIFF'S MOTION TO EXTEND DEADLINE SET FORTH IN ORDER TO SHOW

#### **CAUSE**

NOW COME Plaintiffs C.H. and R.H. o/b/o P.H., by and through their attorneys, ABDNOUR WEIKER LLP, and respectfully move this Court for an order extending the deadline in the Court's Order to Show Cause (ECF No. 5 PageID.201) from June 30, 2025, to July 11, 2025. Plaintiff's Motion is supported by the attached Brief.

Dated: June 26, 2025 Respectfully Submitted,

/s/Elizabeth K. Abdnour
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Attorneys for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I certify that a copy of the Motion and attached Brief has been filed in the above-captioned case and served to the Western District of Michigan Southern Division clerk's office via PACER.

/s/ Elizabeth K. Abdnour

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# BRIEF IN SUPPORT OF PLAINTIFF'S MOTION TO EXTEND DEADLINE SET FORTH IN ORDER TO SHOW CAUSE

NOW COME Plaintiffs C.H. and R.H. o/b/o P.H., by and through their attorneys, ABDNOUR WEIKER LLP, and respectfully move this Court for an order extending the deadline in the Court's Order to Show Cause (ECF No. 5 PageID.201) from June 30, 2025, to July 11, 2025. In support of this motion, Plaintiffs state as follows:

- On June 23, 2025, the Court issued an Order requiring Plaintiffs to show cause by June 30,
   2025, by "filing an amended complaint with their full names."
- 2. Plaintiffs intend to file an amended complaint, as permitted by Fed. R. Civ. P. 15(a)(1), within the 21-day window.

3. The amended complaint will include additional factual allegations and identify Plaintiffs

by their full names.

4. Fed. R. Civ. Pr. 1 directs that the rules be "construed, administered, and employed by the

court and the parties to secure the just, speedy, and inexpensive determination of every

action and proceeding."

5. Extending the deadline to July 11, 2025, would allow Plaintiffs to respond to the Order and

amend their complaint in a single filing. This avoids duplicative submissions and promotes

judicial economy.

6. No party will be prejudiced by the brief extension, and this request is not made for purposes

of delay.

WHEREFORE, Plaintiffs respectfully request that the Court extend the deadline set forth in

the Order to Show Cause from June 30, 2025, to July 11, 2025, to allow Plaintiffs to file an

amended complaint in lieu of a separate response.

Dated: June 26, 2025

Respectfully Submitted,

s/Elizabeth K. Abdnour

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Attorneys for Plaintiffs

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/s/ Elizabeth K. Abdnour